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3 District of Nevada

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13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 DOLLY STODDART,

17 Plaintiff,

18 v.

KILOLO KIJAKAZI,

19 Acting Commissioner of Social Security,

20 Defendant.

) Case No. 2:22-cv-01119-DJA

21 **UNOPPOSED MOTION FOR
EXTENSION OF TIME
(*FIRST REQUEST*)
SECOND**

22 Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully
23 requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal
24 and/or Remand (Dkt. No. 21), currently due on January 30, 2023, by 28 days, through and including
25 February 27, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's
26 scheduling order (Dkt. No. 20) be extended accordingly.

This is Defendant's second request for an extension of time. Good cause exists for this
extension. On January 27, 2023, this case was reassigned to Defendant's lead attorney of record from
another attorney at Social Security's Office of the General Counsel. Defendant's counsel is currently

1 exploring settlement options in this case and will need additional time to continue the process and
2 consult and negotiate with Plaintiff's counsel, as required. If settlement is not possible, Defendant's
3 counsel will need time to draft and file Defendant's responsive brief. In the past two weeks,
4 Defendant's lead counsel has worked on several matters with deadlines before or on Defendant's
5 briefing deadline in this case, including drafting and filing four responsive briefs and working and
6 negotiating settlement in two other cases. This request is made in good faith and with no intention to
7 unduly delay the proceedings, and counsel apologizes for any inconvenience.

8 On January 30, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond
11 to Plaintiff's Motion for Reversal and Remand, through and including February 27, 2023.
12

13 Dated: January 30, 2023

Respectfully submitted,

14 JASON M. FRIERSON
15 United States Attorney
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17 */s/ Ryan Lu*
18 RYAN LU
19 Special Assistant United States Attorney
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21 IT IS SO ORDERED:
22 
23 UNITED STATES MAGISTRATE JUDGE
24

25 DATED: January 30, 2023
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 701 Fifth Avenue, Suite 2900, M/S 221A, Seattle, Washington 98104-7075. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** to be served upon the following by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Dated: January 30, 2023

/s/ Ryan Lu
RYAN LU
Special Assistant United States Attorney